

EXHIBIT A

CAUSE NO. 2020-DCL-02659

JOSE GARCIA	§	IN THE DISTRICT COURT
<i>Plaintiffs</i>	§	
	§	Cameron County - 357th District Court
	§	
VS.	§	_____ JUDICIAL DISTRICT
	§	
CARIBBEAN SUN AIRLINES, INC. d/b/a	§	
WORLD ATLANTIC AIRLINES	§	
<i>Defendant</i>	§	CAMERON COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **JOSE GARCIA**, complaining of **CARIBBEAN SUN AIRLINES, INC.**
d/b/a WORLD ATLANTIC AIRLINES, and for cause of action would show:

I. DISCOVERY

This is a level III discovery case as defined by the Texas Rules of Civil Procedure.

II. PARTIES

Plaintiff is a resident of Cameron County, Texas.

Defendant, Caribbean Sun Airlines is a Florida Limited Liability Company which does business as World Atlantic Airlines and conducts business in Brownsville, Cameron County, Texas. Defendant may be served through its registered agent Tomas Romero, at 6355 NW 36TH ST. SUITE #100, Virginia Gardens, FL 33166 or wherever found.

III. JURISDICTION & VENUE

The subject matter in controversy is within the jurisdictional limits of this court. Venue is proper because all or part of the causes of action giving rise to this lawsuit occurred in Cameron County, Texas.

IV. FACTS

On or about July 15, 2019, Plaintiff was a passengers on a board World Atlantic Flight originating in Brownsville, Cameron County, Texas. The subject aircraft was owned and operated by World Atlantic Airlines. As the flight landed in Columbus, GA, the flight made a severely rough landing, causing personal injuries to the Plaintiff.

V. NEGLIGENCE

At all times relevant to this suit, Defendant owned, operated, and was responsible for the upkeep, safety, and maintenance of the subject aircraft. Moreover, Defendant and its flight crew were responsible for the safety and security of the passengers on board. As such, the Defendant owed the Plaintiffs a duty of reasonable care to insure safe passage while aboard its aircraft and to take all appropriate and prescribed emergency measures with respect to its passengers during the landing. Defendant breached the aforementioned duties to the Plaintiffs, and such breaches proximately caused the injuries, harms and losses they sustained as result of the crash.

VI. REQUEST FOR DISCLOSURE

Under Texas Rule of Civil Procedure 194, plaintiff requests that all defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

VII. DAMAGES

As a result of the hard landing, Plaintiff suffered and will continue to suffer the following damages:

1. Pain and mental anguish in the past and future;
2. Medical expenses in the past and future;
3. Loss of wages and income in the past and future;
4. Physical impairment in the past and future;
5. Loss of Household Services in the past and future; and

6. Disfigurement in the past and future.

By reason of the above, Plaintiffs have suffered losses and damages in a sum within the jurisdictional limits of the Court and for which this lawsuit is brought. In accordance with Texas Rule of Civil Procedure 47, as amended, and with the information currently available, Plaintiffs seeks monetary relief over \$1,000,000.00.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs asks that the Defendant be cited to appear and answer herein, and that upon a final trial of this cause, judgment be entered in favor of the Plaintiffs, pre-judgment and post-judgment interest, costs of court, and such other relief to which the Plaintiffs may be justly entitled.

PLAINTIFFS HEREBY REQUESTS A JURY TRIAL AND TENDER THE APPROPRIATE FEE.

Respectfully submitted,

LAWRENCE LAW FIRM
3112 Windsor Rd., Suite A234
Austin, Texas 78703
(956) 994-0057
(800) 507-4142 - FAX
Lawrencefirm@gmail.com

By: 

LARRY W. LAWRENCE, JR.
State Bar No. 00794145
MICHAEL A. LAWRENCE
State Bar No. 24055826
CELESTE GUERRA
State Bar No. 00795395

ATTORNEYS FOR PLAINTIFF